

CHAITMAN LLP

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Presentment Date: October 1, 2019 12:00 PM

Objection Date: September 24, 2019

*Attorneys for Defendants Gunther K. Unflat
and Margaret Unflat*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

GUNTHER K. UNFLAT, individually and as joint
tenant, and MARGARET UNFLAT, individually and
as joint tenant,

Defendants.

Adv. Pro. No. 10-05420 (SMB)

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT
OF APPLICATION TO WITHDRAW AS COUNSEL**

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C.

§1746, as follows:

1. I am a partner with Chaitman LLP, counsel of record to Defendants Gunther K. Unflat and Margaret Unflat, (the “Defendants”). I submit this declaration in support of an application for an Order pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules of this Court: (1) authorizing Chaitman LLP to withdraw as counsel to the Defendants; and (2) granting such other and further relief as the Court deems just and proper. Unless otherwise stated, the foregoing is based on my personal knowledge.

2. The Trustee commenced this adversary proceeding against the Defendants on December 10, 2010 (the “Adversary Proceeding”).

3. Thereafter, the Defendants retained Becker & Poliakoff LLP to represent them.

4. On behalf of the Defendants, while at Becker & Poliakoff, LLP, I filed a Notice of Appearance on June 30, 2011 (ECF Doc. No. 8).

5. On behalf of the Defendants as a partner of Chaitman LLP, I filed a Notice of Appearance and Request for Service of Papers on October 26, 2015 (ECF Doc. No. 45).

6. Differences have arisen which make it impossible for me to continue to represent the Defendants.

7. The Adversary Proceeding will not be disrupted or unduly delayed as a result of this firm’s withdrawal as Defendants’ counsel.

8. Accordingly, cause exists to grant the application authorizing Chaitman LLP to withdraw as counsel for the Defendants.

Dated: September 10, 2019
New York, New York

/s/ Helen Davis Chaitman